



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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*Order Instituting Rulemaking to Consider
Revisions to Electric Rule 20 and Related
Matters*

Rulemaking 17-05-010
(Filed May 11, 2017)

**MOTION FOR PARTY STATUS OF THE CALIFORNIA STATE
ASSOCIATION OF COUNTIES**

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October 4, 2017

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I. Introduction

The California State Association of Counties (“CSAC”) respectfully moves for party status in this proceeding in accordance with Section 1.4 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure.

II. Interest in this Proceeding

CSAC is a non-profit association representing the interests of California’s 58 counties before the state and federal government. Rule 20 provides important funding to counties for conversion of existing overhead electric facilities to underground. The projects funded through Rule 20 provide significant benefits to the residents and commercial property owners in counties. As such, California’s counties have a vested interest in the Rule 20 program.

CSAC has been working collaboratively with Pacific Gas & Electric (PG&E) over the past seven years to improve implementation of Rule 20 projects. Attached is a copy of a letter CSAC filed in support of PG&E’s Advice Letter No. 4948-E Modifying Its Agreement to Perform Tariff Schedule Related Work, Rule 20A General Conditions (Form 79-117). CSAC and the League of California Cities also jointly filed the attached letter in response to PG&E’s Test Year 2017

General Rate Case (Docket No. A.15-09-001). CSAC would like to join these proceedings as a party so that county governments' interest and experience with the Rule 20 program are considered as part of the rulemaking.

Unfortunately, CSAC is just now filing for party status as we were not made aware of the rulemaking proceedings until late August. As such, we may have missed the opportunity to participate in the prehearing conference and initial public workshop. We respectfully request the opportunity to participate in the rulemaking process moving forward to ensure county perspectives in determining the scope of the rulemaking proceeding.

A. CSAC has the necessary qualifications to participate in proceeding

Established in 1895, CSAC is the unified voice of all 58 counties in California. Governed by elected county supervisors, CSAC is a nonprofit corporation dedicated to representing California county governments before the courts, federal government, and the California Legislature. CSAC is represented by general counsel from the County Councils Association of California ("CCAC"), who thoroughly reviews legal matters of significance to CSAC and California's counties and provides representation.

B. CSAC has an interest in representing California's counties

Rule 20 is a statewide program that impacts each county within California. The main impetus expressed by the Commission in instituting this new rulemaking proceeding is to address the large amount of unredeemed Rule 20 credits in many counties. The new rulemaking proposes to address issues relating to counties population sizes and economic ability to implement the undergrounding of utility lines. The new rulemaking will examine whether Rule 20 needs to be modified to "enhance the fair, efficient allocation of ratepayer funds to communities for the undergrounding of electric infrastructure in specified locations and circumstances." (Docket No. 17-05-010 at p. 14) In addition, specifically in reference to the varying sizes of counties across the state, the rulemaking proposes to consider "whether disadvantaged communities fully benefit from the program, and whether the criteria for considering the public interest should be updated." (Docket No. 17-05-010 at p. 15)

These proceedings will touch directly on issues of public interest in county government administration, as well as infrastructure development funds and how they're allocated to the counties based on their relative size and economic capacity. CSAC's aim in being a party to this proceeding is to represent the interests of the counties in these important matters.

III. Notice

Service of notices, orders, and other correspondence in this proceeding should be directed to California State Association of Counties at the address set forth below:

Kiana L. Valentine
California State Association of Counties
1100 K Street, Suite 101
Tel: (916) 327-7500
E-mail: kvalentine@counties.org

IV. Conclusion

CSAC's participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in the proceeding. For the reasons stated above, CSAC respectfully requests that the Commission grant this Motion for Party Status filing.

Dated: October 4, 2017

Respectfully submitted,

/s/ Kiana L. Valentine

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